

Colorado Department of Public Health and Environment

OPERATING PERMIT

Carestream Health, Inc.

First Issued: September 1, 1999

AIR POLLUTION CONTROL DIVISION COLORADO OPERATING PERMIT

FACILITY NAME: Carestream Health, Inc. OPERATING PERMIT NUMBER

FACILITY ID: 1236350 **06OPWE288**

RENEWED: November 1, 2004 EXPIRATION DATE: November 1, 2009

MODIFICATIONS: See Appendix F of Permit

Issued in accordance with the provisions of Colorado Air Pollution Prevention and Control Act, 25-7-101 et seq Supp. and applicable rules and regulations.

ISSUED TO: PLANT SITE LOCATION:

Carestream Health, Inc. 2000 Howard Smith Ave West

Windsor, CO 80550

2000 Howard Smith Ave West Weld County

Windsor, CO 80550

INFORMATION RELIED UPON

Operating Permit Renewal Application Received: August 29, 2003

And Additional Information Received:

Nature of Business: Manufacturer of photographic supplies

Primary SIC: 3861

RESPONSIBLE OFFICIAL FACILITY CONTACT PERSON

Name: Christopher L. Schmachtenberger Name: Karen Murphy

Title: Site Manager Title: Environmental Engineer

Carestream Health, Inc. Carestream Health, Inc.

Phone: (970) 686-4293 Phone: (970) 686-4032

SUBMITTAL DEADLINES

Semi-Annual Monitoring Period: September - February, March - August

Semi-Annual Monitoring Report: April 1, 2005 & October 1, 2005 and subsequent years

Annual Compliance Period: Begins September 1 to August 31
Annual Compliance Certification: October 1, 2005 and subsequent years

Note that the Semi-Annual Monitoring Report and the Annual Compliance Certification must be received at the Division office by 5:00 p.m. on the due date. Postmarked dates will not be accepted for the purposes of determining the timely receipt of those reports.

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 This facility consists of several buildings containing a variety of equipment used to manufacture photographic supplies. Medical x-ray film, graphic arts film, and color photographic paper are produced in the Sensitizing Complex (Buildings C-40, C-41, C-42, C-43 and C-46). Light sensitive emulsions consisting of silver halide and other chemicals are applied to a support to produce photographic film and paper. The coated film and paper is then chilled to harden the emulsion, dried, and wound into large rolls. The Support Manufacturing operation (Building C-50) produces a flexible, thermoplastic polyester material (called Estar) of high molecular weight upon which light-sensitive emulsion is applied. The polyester is extruded and allowed to cool and harden. The plastic is then reheated, processed, coated with several sublayers, cooled, and wound into large rolls.

The facility is located in Weld County, near Windsor, an attainment area for all pollutants. The facility is located in the 8-Hour Ozone Control Area, as defined in Regulation No. 7, Section II.A.16.

Wyoming is an affected state within 50 miles of the plant. The following Federal Class I designated areas are within 100 kilometers of the plant: Rocky Mountain National Park and Rawah National Wilderness Area.

- 1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.
- 1.3 This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet the applicable substantive New Source Review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this operating permit and shall survive reissuance. This permit incorporates the applicable requirements from the following construction permit: 96WE473.
- 1.4 All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:** Permit Condition Number(s): Section IV Conditions 14, 18 & 3.g (as noted).
- 1.5 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 22 of the General Conditions in Section IV of this permit.

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2. Prevention of Significant Deterioration

2.1 Based on information provided by the applicant, this facility is not categorized as a major stationary source (no single criteria pollutant emissions with a Potential to Emit >250 Tons/Year) as of the date of this permit. The facility therefore is not subject to the PSD review requirements of 40 CFR 52.21. (Colorado Regulation No. 3, Part D).

Future modifications to this facility which are major by themselves will result in the application of the PSD review requirements. In addition, future modifications at this facility may result in the facility being classified as a major stationary source. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase (see Regulation No. 3, Part D, Section II.A.26 and 42) for any pollutant as listed in Regulation No. 3, Part D, Section II.A.42 or a modification which is major by itself may result in the application of the PSD review requirements.

2.2 The following Operating Permit is associated with this facility for purposes of determining applicability of PSD regulations: None

3. Accidental Release Prevention Program (112(r))

Based on the information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (section 112(r) of the Federal Clean Air Act).

4. Summary of Emission Units

4.1 The emissions units regulated by this permit are the following:

AIRS Identifier*	Facility Identifier	Description	Pollution Control Device	Construction Permit
		Facility Wide Limit** - Covers all operations listed below		96WE473
001	S040	Sensitizing Complex, Buildings C-40, C-41, C-42, C-43, C-46		
002	S050	Support Manufacturing, Building C-50	Railroad Car Unloading: HEPA Filter	
			Dry Chemical Weighing Room: HEPA Filter	
			PET unloading: HEPA filter	

Appendix G lists specific equipment in each of the Buildings and associated AIRS Identification Numbers.

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^{**} Sources listed in bold face are sources for which specific permit terms are listed in this Operating Permit.

4.2 Equipment Replacement

This permit covers only the specific existing equipment listed in Appendix G of this permit.

4.3 **Alternate Operating Scenarios**

No alternate operating scenarios were requested for this facility.

5. **Compliance Assurance Monitoring (CAM)**

The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV:

None. (MACT standards and sources with continuous monitoring devices are not subject to CAM requirements.)

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SECTION II - Specific Permit Terms

1. Facility Wide Limit

See Equipment List, Appendix G

Parameter	Permit	Limitation	Compliance	Mor	Monitoring	
	Condition Number			Method	Interval	
VOC	1.1	48.3Tons/Yr	See Condition 1.1	Recordkeeping	Monthly	
PM	1.1	11.8 Tons/Yr		Calculation		
PM_{10}	1.1	11.8 Tons/Yr				
Opacity	1.2	Not to exceed 20%, except as provided for below		Nature of the Processes	Annually	
		Certain Operating Conditions - Not to exceed 30%, for a period or periods aggregating more than six (6) minutes in any 60 consecutive minutes				
Consumption	1.3	See Condition 1.3		Recordkeeping	Monthly	

1.1 Facility-wide emissions shall not exceed the rates listed in the above table (Construction Permit 96WE473).

Compliance with annual limits shall be determined on a rolling twelve month total. By the 45th day after the close of each month a new twelve month total shall be calculated using the previous twelve months' data. The permit holder shall calculate monthly emissions using the procedures described below and keep a compliance record on site for Division review.

VOC Emissions:

Building C-40, C-41, C-42, C-43, & C-46:

Except for the separately listed chemicals, mass balance shall be used to estimate emissions using the following equation:

VOC emissions = VOC consumption.

Note: Dibutyl Phthalate is not emitted as a VOC.

Building C-50:

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Mass balance shall be used to estimate emissions using the following equation:

VOC emissions = VOC consumption

For thermal degradation byproducts in extruded material:

VOC emissions = 64 (lbs VOC/Million lbs extruded) x Extruder Throughput (Millions lbs/month)

For pre-polymer byproducts removed by molecular sieve regenerations:

VOC emissions = 3.5 (lbs VOC/Regeneration) x Regenerations/month

PM/PM₁₀ Emissions:

Building C-40, C-41, C-42, C-43, & C-46:

For dibutyl phthalate:

 PM/PM_{10} Emissions = 1% weight of consumption

Building C-50:

Railroad Car PET Powder Unloading: PM/PM_{10} Emissions = 0.01 gr/dscf x 888 dscfm x 8760 hr/yr x 60 min/hr x lb/7000 gr x ton/2000 lb

Railroad Car PET Pellet Unloading: PM/PM_{10} Emissions = PET pellet throughput lb/yr x (1-0.9999) x 0.005 x ton/2000 lb

Three Pellet Grinders (total): 0.02 gr/cf x 1207 cfm x 60 min/hr x 8760 hr/yr x lb/7000 gr x ton/2000 lb

Chemical Weighing Hood: PM/PM_{10} Emissions = 0.04 gr/dscf x 8500 dscfm x 365 hr/yr x 60 min/hr x lb/7000 gr x ton/2000 lb

Chemical Making: PM/PM_{10} Emissions = Amount of Resorcinol consumed.

The permittee shall maintain emission calculation records on site for Division inspection upon request.

1.2 Except as provided in Colorado Regulation No. 1, Section II.A.4, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This

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standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which these standards are based is EPA Method 9 (40 CFR Part 60, Appendix A (July 1992)) in all subsections of Section II of Regulation No. 1. (Construction Permit 96WE473, and Colorado Regulation No 1, Section II.A.1). No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six minutes in any sixty consecutive minutes. (Colorado Regulation No. 1, Section II.A.4).

The PM emission sources located at this facility are the chemical making, polymer unloading, pellet unloading, three pellet grinders, chemical melting kettles, and chemical weighing processes. When operated in their current configuration and method, no opacity is generated. By certifying compliance with this Condition 1.2, the source is certifying that no changes have been made to the equipment, process, or operation such that opacity is generated. In addition, the Building C-50 Rail Car Polymer Unloading, Pellet Unloading, and Dry Chemical Weighing Room HEPA filters shall be replaced at least annually. The Building C-41 Dibutyl Phthalate filters and the dust collector associated with the grinders shall be operated and maintained in accordance with manufacturer's recommendations. Such recommendations and practices shall be in written format and made available for Division inspection upon request.

- 1.3 The permittee shall maintain records of the monthly consumption of VOC containing materials, including throughput data, in-process inventory, material safety data sheets, number of Building C-50 molecular sieve regenerations, and off-site waste shipment information, as necessary in order to estimate emissions as set forth in Section II, Condition 1.1. In addition, the permittee shall maintain records of Resorcinol and Dibutyl Phthalate consumption. These records shall be kept on site for Division inspection upon request. (Colorado Regulation No. 3, Part B, III.A.4 and IV.E., and Construction Permit 90WE0466)
- 1.4 The permit conditions for the Railroad Car PET Pellet Unloading & three Pellet Grinders shall expire if the owner or operator of the source for which this permit was issued: (i) does not commence construction/modification or operation of this source within 18 months after either the date of issuance of this initial approval permit or the date on which such construction or activity was scheduled to commence as set forth in the permit application associated with this permit; (ii) discontinues construction for a period of eighteen months or more; or (iii) does not complete construction within a reasonable time of the estimated completion date (See General Condition No. 6., Item 1.). Upon a showing of good cause by the permittee, the Division may grant extensions of the permit. (Reference: Regulation No. 3, Part B, Section III.F.4.)

2. Emission Factors

The permittee shall comply with the provisions of Regulation No.3 concerning APEN reporting. Emission factors and/or other emission estimating methods that are specified within this permit can not be adjusted

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without requiring a permit modification. Emission factors and/or other emission estimating methods used to comply with the reporting requirements of Regulation No. 3, Part A, Section II can be updated and modified as specified in that Section. These changes by themselves do not require any permitting activities though the resulting emission estimate may trigger permitting activities.

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SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part C, §§ I.A.4, V.D. & XIII.B; § 25-7-114.4(3)(a), C.R.S.

1. Specific Non-Applicable Requirements

Based on the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance.

Emission Unit Description &Number	Applicable Requirement	Justification
Facility Wide	40 CFR Parts 9 and 63, as adopted by reference in Colorado Regulation No. 8, Part E	Permitee maintains records of coating and adhesive use to demonstrate they are an incidental wood product manufacturer
	40 CFR Part 63, Subpart U, as adopted by reference in Colorado Regulation No. 8, Part E	Permitee does not manufacture as a primary product any of the elastomer products listed in this regulation
	40 CFR Part 63, Subpart W, as adopted by reference in Colorado Regulation No. 8, Part E	Permitee is not an existing, new, or reconstructed manufacturer of epoxy resins or wet strength resins
	40 CFR Part 63, Subpart V, as adopted by reference in Colorado Regulation No. 8, Part E	Permitee purchases low molecular weight PET from an offsite source
	40 CFR Part 61	Facility is not subject to listed NESHAPS
	40 CFR Part 9 and Part 63, Subpart Q	Facility does not use chromium in its industrial cooling towers
	40 CFR Part 82, Subpart E	Product does not contain or is not made with ozone depleting compounds
	Colorado Regulation No. 7, except for Sections V, VI.B.1 and VII.C	This facility is not located in an ozone nonattainment or maintenance area.
	Colorado Regulation No. 18, 40 CFR Part 72 and General Condition 26 of this permit	There are no affected units subject to the acid rain provisions at this facility
	Colorado Regulation No. 8, Parts A and C	Facility is not subject to listed NESHAPS and is not a stationary source of lead.
	General Condition 20 of this permit	There are no portable sources associated with this facility.
	General Condition 29.a of this permit	This provision applies to sources in ozone nonattainment areas.
	General Condition 30 of this permit	This facility does not advertise, sell, install, or use wood stoves or wood burning appliances
P040	40 CFR Part 60, Subpart Kb, as adopted by reference in Colorado Regulation No. 6, Part A	All VOL storage tanks are less than 40 m ³ in size
	Colorado Regulation No. 3, Part B1.A	Chemical Weigh Station, Gelatin Weigh Station, and Silver Recovery received grandfathered status

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2. General Conditions

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

- 2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;
- 2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;
- 2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;
- 2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.
- 2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

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SECTION IV - General Permit Conditions

1. **Administrative Changes**

Regulation No. 3, 5 CCR 1001-5, Part A, § III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.36.a. The permittee may immediately make the change upon submission of the application to the Division.

2. **Certification Requirements**

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.&e. and V.C.17.

- Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air b. Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.
- Compliance certifications shall contain: c.
 - the identification of each permit term and condition that is the basis of the certification; (i)
 - (ii) the compliance status of the source;
 - (iii) whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the source, currently and over the (iv) reporting period; and
 - such other facts as the Air Pollution Control Division may require to determine the compliance (v) status of the source.
- d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.
- If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the e. federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

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3. Common Provisions

Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II, E., II.F., II.I, and II.J

a. To Control Emissions Leaving Colorado

When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.

b. Emission Monitoring Requirements

The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations. Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

- (i) specifies or approves, in specific cases, the use of a test method with minor changes in methodology;
- (ii) approves the use of an equivalent method;
- (iii) approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or
- (iv) waives the requirement for performance test(s) because the owner or operator of a source has demonstrated by other means to the Division's satisfaction that the affected facility is in compliance with the standard.
 Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7 1973, and pursuant to regulations promulgated by the Commission.

Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

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The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

- (i) Sampling ports adequate for test methods applicable to such facility,
- (ii) Safe sampling platform(s),
- (iii) Safe access to sampling platform(s).
- (iv) Utilities for sampling and testing equipment.

Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard the arithmetic mean of results of at least three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

Nothing in this section shall abrogate the Division's authority to conduct its own performance test(s) if so warranted.

d. Upset Conditions and Breakdowns

Upset conditions, as defined, shall not be deemed to be in violation of the Colorado regulations, provided that the Division is notified as soon as possible, but no later than two (2) hours after the start of the next working day, followed by a written notice to the Division explaining the cause of the occurrence and that proper action has been or is being taken to correct the conditions causing the violation and to prevent such excess emission in the future.

e. Circumvention Clause

A person shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of air pollutants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of this regulation. No person shall circumvent this regulation by using more openings than is considered normal practice by the industry or activity in question.

f. Compliance Certifications

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in the Colorado State Implementation Plan, nothing in the Colorado State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Evidence that has the effect of making any relevant standard or permit term more stringent shall not be credible for proving a violation of the standard or permit term.

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

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Note that until such time as the U.S. EPA approves this provision into the Colorado State Implementation Plan (SIP), it shall apply only to State-Only permit terms and conditions and shall be enforceable only by the State.

An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

- (i) The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;
- (ii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance;
- (iii) If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- (iv) The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;
- (v) All possible steps were taken to minimize the impact of excess emissions on ambient air quality;
- (vi) All emissions monitoring systems were kept in operation (if at all possible);
- (vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,
- (viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards or national emissions standards for hazardous air pollutants, or any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which

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may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment.

Compliance Requirements 4.

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d., § 25-7-122.1(2), C.R.S.

- The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.
- b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any c. request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.
- d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.
- Any schedule for compliance for applicable requirements with which the source is not in compliance at the e. time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.
- f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:
 - dates for achieving the activities, milestones, or compliance required in the schedule for (i) compliance, and dates when such activities, milestones, or compliance were achieved; and
 - (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

5. Emergency Provisions

Regulation No. 3, 5 CCR 1001-5, Part C, § VII.

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. the permitted facility was at the time being properly operated;
- c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or upset provision contained in any applicable requirement.

6. Emission Standards for Asbestos

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, "emission standards for asbestos."

7. Emissions Trading, Marketable Permits, Economic Incentives

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

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8. Fee Payment

C.R.S. § § 25-7-114.1(6) and 25-7-114.7

- a. The permittee shall pay an annual emissions fee in accordance with the provisions of C.R.S. § 25-7-114.7. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.
- b. The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.
- c. The permittee shall pay an APEN fee in accordance with the provisions of C.R.S. § 25-7-114.1(6) for each APEN or revised APEN filed.

9. Fugitive Particulate Emissions

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, [] III.D.1.

10. Inspection and Entry

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

- a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;
- b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;
- d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

11. Minor Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

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12. New Source Review

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

13. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

This permit does not convey any property rights of any sort, or any exclusive privilege.

14. Odor

Regulation No. 2, 5 CCR 1001-4, Part A

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

15. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit . The permit shield shall not apply to any off-permit change.

16. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.-II.

17. Open Burning

Regulation No. 9, 5 CCR 1001-11.

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

18. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds.

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19. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

- a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.
- b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

20. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

21. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

"Prompt" is defined as follows:

- a. Any definition of "prompt" or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit; or
- b. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:
 - i. For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence:
 - ii. For emissions of any regulated air pollutant, excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report shall be made within 48 hours; and
 - iii. For all other deviations from permit requirements, the report shall be submitted every six (6) months, except as otherwise specified by the Division in the permit in accordance with paragraph 22.d. below.
- c. If any of the conditions in paragraphs b.i or b.ii above are met, the source shall notify the Division by telephone (303-692-3155) or facsimile (303-782-0278) based on the timetables listed above. [Explanatory note: Notification

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by telephone or facsimile must specify that this notification is a deviation report for an Operating Permit.] A written notice, certified consistent with General Condition 2.a. above (Certification Requirements), shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required above.

"Prompt reporting" does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

22. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

- a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:
 - (i) date, place as defined in the Operating Permit, and time of sampling or measurements;
 - (ii) date(s) on which analyses were performed;
 - (iii) the company or entity that performed the analysis;
 - (iv) the analytical techniques or methods used;
 - (v) the results of such analysis; and
 - (vi) the operating conditions at the time of sampling or measurement.
- b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.
- c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.
- d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the compliance assurance monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.
- e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of

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control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

23. Reopenings for Cause

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

- a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.
- b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.
- c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.
- d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

24. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

25. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

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26. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

27. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

- a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.
- b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

28. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

29. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

a. For sources located in an ozone non-attainment area or the Denver Metro Attainment Maintenance Area, all storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet

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shall be flush with the tank bottom.

b. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

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OPERATING PERMIT APPENDICES

- A INSPECTION INFORMATION
- **B REPORTING REQUIREMENTS AND DEFINITIONS**
- C COMPLIANCE CERTIFICATION REPORT FORMAT
- **D-NOTIFICATION ADDRESSES**
- **E PERMIT ACRONYMS**
- F PERMIT MODIFICATIONS
- G EQUIPMENT LIST
- *DISCLAIMER:

None of the information found in these Appendices shall be considered to be State or Federally enforceable, unless otherwise stated in this permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

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APPENDIX A - Inspection Information

Directions to Plant:

The plant is located in Northern Colorado near the town of Windsor. From Denver, take I-25 North approximately 60 miles and take the Windsor exit East. Follow Highway 392 through the town of Windsor and turn right on Highway 257. After about 1.5 miles, turn left to access the Health Group facility.

Safety Equipment Required:

- Eye Protection
- Safety Shoes
- Conductive Shoes
- Hearing Protection

Facility Plot Plan:

Figure 1 (following page) shows the plot plan as submitted on June 16, 1998 with the source's revised Title V Operating Permit Application.

List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

Insignificant activities and/or sources of emissions as submitted in the application are as follows:

Building C-20 Distribution Center

Building C-40, C-41, C-42, C-43, and C-46

C-41-8 - Welding Booth

C-40 - Coronal Discharge Treatment

C-40s – Quality Control and Process Support Labs

C-43 – Chemical Storage Areas

C-43 – Dry Chemical Weight Station

C-46 – Wet Scrubber

Building C-50

C-50-73 - Quality Lab

C-50 - Regeneration of Molecular Sieve Adsorber

C50-51, 50-52, 50-53: Prepolymer Silos

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C50-54, 50-55, 50-56: Polymer Silos

Plant Site:

Noncommercial (in-house) experimental and analytical lab equipment which is bench scale in nature including quality control/quality assurance laboratories, process support laboratories, environmental laboratories, supporting a manufacturing or industrial facility, and research and development laboratories

Each individual piece of fuel burning equipment, other than smokehouse generators and internal combustion engines, which uses gaseous fuel, and which has a design rate less than or equal to 5 million Btu per hour.

Chemical storage tanks or containers that hold less than 500 gallons, and which have a daily throughput less than 25 gallons.

Landscaping and site housekeeping devices equal to or less than 10 H.P. in size (lawnmowers, trimmers, snow blowers, etc.).

Chemical storage areas where chemicals are stored in closed containers, and where total storage capacity does not exceed 5000 gallons. This exemption applies solely to storage of such chemicals. This exemption does not apply to transfer from, to, or between such containers.

Storage tanks meeting all of the following criteria:

- (i.) annual throughput is less than 400,000 gallons; and
- (ii) the liquid stored is one of the following:
 - (A) diesel fuels 1-D, 2-D, or 4-D;
 - (B) fuel oils #1 through #6;
 - (C.) Gas turbine fuels 1-GT through 4-GT;
 - (D) an oil/water mixture with a vapor pressure lower than that of diesel fuel (Reid vapor pressure of .025 PSIA).

Each individual piece of fuel burning equipment which uses gaseous fuel, and which has a design rate less than or equal to 10 mmBtu/hour, and which is used solely for heating buildings for personal comfort.

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Stationary Internal Combustion Engines which:

(i.) power portable drilling rigs; or

(ii) are emergency power generators which have a rated horsepower of less than 260 or; operate no more than 250 hours per year and have a rated horsepower of less than 737; or operate no more than 100 hours per year and have a rated horsepower of less than 1840; or

(iii) have actual emissions less than five tons per year or rated horsepower of less than 50.

Air pollution emission units, operations or activities with emissions less than the appropriate de minimis reporting level.

Agricultural operations normally conducted at the farm or ranch including, for example, cultivating and harvesting

Air conditioning and ventilation systems not designed to remove air pollutants Unpaved public and private roads

Sanding of streets and roads

Open burning activities

Street and parking lot striping

Charging station for lift trucks

Architectural painting, roof coating material and associated surface preparation for maintenance purposes

Aerosol can usage

Road and lot paving operations

Adhesive use - not product related

Fire training activities

Landscaping and site housekeeping devices equal to or less than 10 HP in size

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Fugitive emissions from landscaping activities (e.g., weeding, sweeping)

Landscaping use of pesticides, fumigants, and herbicides

Smoking rooms and areas

Vacuum cleaning systems used exclusively for industrial, commercial, or residential housekeeping purposes

Acetylene, butane, and propane torches and other flame cutting torches

Janitorial activities and products

Groundskeeping activities and products

Office emissions, including cleaning, copying, and restrooms Storage of butane, propane, or liquefied petroleum gas in a vessel with a capacity of less than 60,000 gallons

Forklifts

Non-road vehicles (includes lawnmowers)

Sulfuric Acid and Caustic tanks less than 10,500 gallons

Small remote reservoir degreasers, exempt from APEN reporting requirements

Brazing, soldering or welding operations, except those which use lead based compounds

Electrically operated curing ovens, drying ovens, and similar activities, articles, equipment, or appurtenances

Sandblast equipment when the blast material is recycled and the blasted material is collected

Seal & lubricating oil systems for steam turbine electric generators

Battery recharging areas

Gasoline stations located in ozone attainment areas

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Lubricating Oil Storage tanks with capacity <40,000 gallons

Lubricating oil conditioning systems

The use of pesticides, fumigants, and herbicides, when used in accordance w/ FIFRA requirements

Ventilation of emissions from mobile sources operated within a tunnel, garage, or building

Appendix B **Reporting Requirements and Definitions**

with codes ver 6/1/06

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

- (A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);
- (B) fails to notify or report as required under the Act; or
- (C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

The Part 70 Operating Permit program requires three types of reports to be filed for all permits. All required reports must be certified by a responsible official.

Report #1: Monitoring Deviation Report (due at least every six months)

For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

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Report #2: Permit Deviation Report (must be reported "promptly")

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit requirements, including those attributable to upset conditions and malfunctions as defined in this Appendix, the probable cause of such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, "upset" shall refer to both emergency conditions and upsets. Additional discussion on these conditions is provided later in this Appendix.

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due as set forth in General Condition 21. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

- (1) A situation where emissions exceed an emission limitation or standard contained in the permit;
- (2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;
- (3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,
- (4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

1 = Standard: When the requirement is an emission limit or standard 2 = Process: When the requirement is a production/process limit

3 = Monitor: When the requirement is monitoring 4 = Test: When the requirement is testing

5 = Maintenance: When required maintenance is not performed
 6 = Record: When the requirement is recordkeeping
 7 = Report: When the requirement is reporting

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8 = CAM: A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the

Compliance Assurance Monitoring (CAM) Rule) has occurred.

9 = Other: When the deviation is not covered by any of the above categories

Report #3: Compliance Certification (annually, as defined in the permit)

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- Whether or not the method(s) used by the owner or operator for determining the compliance status with each permit term and condition during the certification period was the method(s) specified in the permit. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.¹

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For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event. Further, periods of excess emissions during startup, shutdown and malfunction may not be found to be a violation of an emission limitation or standard where the source adequately shows that any potential deviations as a result of these infrequent periods were minimized to the extent practicable and could not have been prevented through careful planning, design, or were unavoidable to prevent loss of life, personal injury, or severe property damage.

• Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

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Startup, Shutdown, Malfunctions, Emergencies, and Upsets

Understanding the application of Startup, Shutdown, Malfunctions, Emergency provisions, and the Upset provisions is very important in both the deviation reports and the annual compliance certifications.

Startup, Shutdown, and Malfunctions

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and would still be noted in the deviation report. In regard to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergencies and Upsets

Under the Emergency provisions of Part 70 and the Upset provisions of the State regulations, certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

Malfunction (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Malfunction (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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Upset means an unpredictable failure of air pollution control or process equipment which results in the violation of emission control regulations and which is not due to poor maintenance, improper or careless operations, or is otherwise preventable through exercise of reasonable care.

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APPENDIX B: Monitoring and Permit Deviation Report - Part I

- 1. Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.
- 2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or upset or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or Upsets) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Carestream Health, Inc.	
OPERATING PERMIT NO: 06OPWE288	
REPORTING PERIOD:	(see first page of the permit for specific reporting period and
dates)	

Operating	erating		PermitDeviations noted During Period? ¹		Type of Deviation		Upset/Emergency Condition Reported During Period?	
Permit Unit ID	Unit Description	YES	NO			YES	NO	
	Facility Wide Limit			•				
	Insignificant Activities							
	General Conditions							

¹ See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

1 = Standard: When the requirement is an emission limit or standard 2 = Process: When the requirement is a production/process limit

3 = Monitor: When the requirement is monitoring 4 = Test: When the requirement is testing

5 = Maintenance: When required maintenance is not performed
 6 = Record: When the requirement is recordkeeping
 7 = Report: When the requirement is reporting

8 = CAM: A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the

Compliance Assurance Monitoring (CAM) Rule) has occurred.

9 = Other: When the deviation is not covered by any of the above categories

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² Use the following entries, as appropriate

APPENDIX B: Monitoring and Permit Deviation Report - Part II

FACILITY NAME: Carestream Health, Inc OPERATING PERMIT NO: 06OPWE288 REPORTING PERIOD:	c.		
Is the deviation being claimed as an:	Emergency	Upset	N/A
(For NSPS/MACT) Did the deviation occur during:	Startup	Shutdown	Malfunction
	Normal Operation		
OPERATING PERMIT UNIT IDENTIFICATION:			
Operating Permit Condition Number Citation			
Explanation of Period of Deviation			
<u>Duration (start/stop date & time)</u>			
Action Taken to Correct the Problem			
Measures Taken to Prevent a Reoccurrence of the Pr	<u>roblem</u>		
Dates of Upsets/Emergencies Reported (if applicable	<u>e)</u>		
Deviation Code	Division Code QA:		
SEE EXAMPLI	E ON THE NEXT	PAGE	

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EXAMPLE

Emergency UpsetXX_	N/A
ol - Unit XXX	
<u>oblem</u>	
<u>le)</u>	
Division Code QA:	
	Emergency UpsetXX_ Startup Shutdown Normal Operation ol - Unit XXX bblem le) Division Code QA:

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Renewed: November 1, 2004

Last Revised: May 1, 2007

APPENDIX B: Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Carestream Health, Inc.	
FACILITY IDENTIFICATION NUMBER:	1236350
PERMIT NUMBER: 06OPWE288	
REPORTING PERIOD:	(see first page of the permit for specific reporting period and dates)
	al Deviation Reports must be certified by a responsible official as rt A, Section I.B.38. This signed certification document must be ed.
STATEMENT OF COMPLETENESS	
e e e e e e e e e e e e e e e e e e e	submitted in its entirety and, based on information and belief that the statements and information contained in this submittal
1-501(6), C.R.S., makes any false materia	te that any person who knowingly, as defined in Sub-Section 18- al statement, representation, or certification in this document is unished in accordance with the provisions of Sub-Section 25-7
Printed or Typed Name	Title
Signature of Responsible	e Official Date Signed
Note: Deviation reports shall be submitt permit. No copies need be sent to the U.S.	ted to the Division at the address given in Appendix D of this . EPA.
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APPENDIX C

Required Format for Annual Compliance Certification Reports

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME: Carestream Health, Inc.

OPERATING PERMIT NO: 06OPWE288

REPORTING PERIOD:

I. Facility Status

During the entire reporting period, this source was in compliance with ALL terms and cond	itions contained
in the Permit, each term and condition of which is identified and included by this reference.	The method(s)
used to determine compliance is/are the method(s) specified in the Permit.	

With the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Operating Permit Unit ID	Unit Description	Deviations Reported ¹		Monitoring Method per Permit? ²		Was compliance continuous or intermittent? ³	
110	110		Current	YES	NO	Continuous	Intermittent
	Facility wide limits						
General Conditions							
Insignificant Activities ⁴							

¹ If deviations were noted in a previous deviation report, put an "X" under "previous". If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an "X" under "current". Mark both columns if both apply.

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² Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark "no" and attach additional information/explanation.

NOTE:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

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³ Note whether the compliance status with of each term and condition provided was continuous or intermittent. "Intermittent Compliance" can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

⁴ Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II.	Status for Accidental Release Prevention Program:						
	A.	This facility is subject is not subject to the provisions of the Adrese Prevention Program (Section 112(r) of the Federal Clean Air Act)	ccidental				
	B.	If subject: The facility is is is is not in compliance with requirements of section 112(r).	all the				
III.	Certifi	1. A Risk Management Plan will be has been submitted appropriate authority and/or the designated central location by the required date.	ed to the				
Colora	ido Reg	on for the Annual Compliance Certification must be certified by a responsible official as d gulation No. 3, Part A, Section I.B.38. This signed certification document must be package being submitted.					
reasor	able ir	ewed this certification in its entirety and, based on information and belief form equiry, I certify that the statements and information contained in this certification a d complete.					
C.R.S	., make	that the Colorado Statutes state that any person who knowingly, as defined in § 18-18 any false material statement, representation, or certification in this document is gur and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.					
		Printed or Typed Name Title					
		Signature Date Signed					
		npliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental	Protection				

APPENDIX D Notification Addresses

1. Air Pollution Control Division

Colorado Department of Public Health and Environment Air Pollution Control Division Operating Permits Unit APCD-SS-B1 4300 Cherry Creek Drive S. Denver, CO 80246-1530

ATTN: Jim King

2. United States Environmental Protection Agency

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice Mail Code 8ENF-T U.S. Environmental Protection Agency, Region VIII 1595 Wynkoop Street Denver, CO 80202-1129

Permit Modifications, Off Permit Changes:

Office of Partnerships and Regulatory Assistance Air and Radiation Programs, 8P-AR U.S. Environmental Protection Agency, Region VIII 1595 Wynkoop Street Denver, CO 80202-1129

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YR -

Year

APPENDIX E Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
CRS -	Colorado Revised Statute
dscf -	Dry Standard Cubic Feet
dcfm -	Dry Standard Cubic Feet per Minute
EPA -	Environmental Protection Agency
FR -	Federal Register
gr -	Grains
HAPs -	Hazardous Air Pollutants
LBS -	Pounds
m -	meter
mmBtu/hr -	Million British Thermal Units per Hour
mmscf -	Million Standard Cubic Feet
MACT -	Maximum Achievable Control Technology
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
NSR -	New Source Review
PM -	Particulate Matter
PM_{10} -	Particulate Matter Under 10 Microns
ppm -	Parts per Million
PSD -	Prevention of Significant Deterioration
RACT -	Reasonably Available Control Technology
RTO -	Regenerative Thermal Oxidizer
SIC -	Standard Industrial Classification
TPY -	Tons Per Year
VOC -	Volatile Organic Compounds
VOL -	Volatile Organic Liquid
TID	T 7

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APPENDIX F Permit Modifications

DATE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION			
Note: The conditions in t 96OPWE128 permit cond	his permit were previously included i litions when they were moved to this p	n permit 96OPWE128. The following list indicates changes that were made to the permit.			
November 21, 2006	Information Page	Administrative Amendment - Update permit contact information			
	Section I, Condition 1.1	Administrative Amendment - Revise facility description. Description of area attainment status is updated.			
	Section I, Condition 2.2	Permit 96OPWE128 is associated with this permit for PSD purposes.			
	Section II, Condition 1	Minor Modification - Revise VOC and PM/PM ₁₀ emission limits. Previous facility wide limits are split between two permits			
	Section II, Condition 1.1	Minor Modification – Add two compounds to VOC emissions calculation list for C-29. Clarify that acrylomide is not emitted from C-29. Add DBP to Building C-40 PM emission calculations. Indicate that DBP is not emitted as a VOC. Add extrusion and molecular sieve VOC emission calculation procedures for C-50.			
	Section II, Condition 1.3	Minor Modification – Add number of molecular sieve regenerations and DBP use to recordkeeping requirements.			
	Appendix G	Add extrusion equipment to C-50			
February 27, 2007	Section II, Condition 1.1 & 1.2	Minor Modification – Added the railroad car PET pellet unloading and three pellet grinders to the permit.			
	Section I, Condition 2.1	Remove reference to boilers. Boilers contained in permit 96OPWE128. Update the Regulation No. 3 citations.			
	Section III	Inserted the new permit shield citation.			
	Section IV - General Conditions 21, 22d, 3.g	Updated permit with current language.			
	Section I, 1.4	Update permit with current language.			
	Appendix B & C	Update permit with current language & requirements.			
	Appendix D	New EPA mailing address			
	Appendix G	Add the railroad car PET pellet unloading and three pellet grinders to C-50.			
May 1, 2007	Information page and throughout permit	Administrative Modification - Transfer of ownership from Kodak Colorado Division – Health Group to Carestream Health, Inc. New responsible official and permit contact, new facility ID & address.			
	Section I, 2.2	No other operating permits are now associated with this facility. The reference to the Kodak facility has been removed. These are considered separate sources as identified in the February 7, 2007 letter from the Division.			
	Information page	A new Facility ID has been assigned to identify this as a separate source from Kodak.			

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Appendix G Equipment List

BUILDING	LOCATION	AIRS	EQUIPMENT	DESCRIPTION
		IDENTIFIER	NUMBER	
C-40, 41,	Melting Rm	152	C40-2	Melting Kettles
42, and 43	Coating	153	C40-3 through	Dryers
	Machine		10	
	Hardener Rm		C40-11	Process Vessels
	Melting Rm		C40-12	Melting Vessels
		150	C40	Fugitive Emissions
	SMU		C041	SMU (Solution Making Unit)
	Dye Rms	200	C41-1	Chemical Making Kettles
	Dye Rms	200	C41-2	Chemical Making Kettles, Filters
	Dye Rms	201	C41-3	Chemical Making Kettles
	Misc Gel Rm	202	C41-4	Chemical Making Kettles, Filters
	Dispersion Rm	204	C41-6	Process Vessel
	Dispersion Rm	204	C41-7	Process Vessel
	Emulsion Rms		C42-EF426	Chemical and Emulsion Preparation
				Shop
C-50	U-Coat Making	401	C50-11	Doctoring Room
	Rm			-
	Chem Weigh		C50-13	Dry Chemical Weighing Hood
	Rm			
	501 Machine			Molecular Sieve Adsorbers
	501 Machine			Extruder & Clean Scrap Recycle
	501 Machine		C50-14	No. 1 & 2 Air Sections
	501 Machine	402	C50-16	Drafter Heat Section Exhaust
	501 Machine		C50-17	Drafter Cool Section Exhaust
	501 Machine	403	C50-18	Tenter Heat Section Exhaust
	501 Machine	404	C50-21/21A	No. 5 Air Section
	501 Machine	405	C50-22	No. 6 Air Section
	501 Machine	406	C50-25A	5x and 6x Coating Section
	501 Machine		C50-27A	No. 8 Air Section
C-50	Polymer Area		C50-51	Railroad Car PET Powder Unloading
			F-50-SS	Railroad Car PET Pellet Unloading
			DF-50	Three Pellet Grinders with associated
				cyclones and dust collector
		407	C50-72	X-Hopper Cleaning Room

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